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9
10 **IN THE UNITED STATES DISTRICT COURT FOR THE**
11 **NORTHERN MARIANA ISLANDS**

12 **DUSTIN M. PANGELINAN,**

Civil Action No. 08-0021

13 **Plaintiff,**

14 **v.**

**PLAINTIFF'S INITIAL
DISCLOSURES
PURSUANT TO RULE 26(a)**

15 **COMMONWEALTH UTILITIES
CORPORATION,**

16 **Defendant.**

17 Plaintiff Dustin M. Pangelinan ("Mr. Pangelinan") hereby makes the following
18 initial disclosures pursuant to F.R.C.P. 26(a)(1):

19 A. The name, and if known, address and telephone number of each individual likely to
20 have discoverable information that Mr. Pangelinan may use to support his case.

- 21 1. Mr. Pangelinan.
- 22 2. The individuals identified by Defendant Commonwealth Utilities Corporation
23 ("CUC").
- 24 3. The individuals working at CUC who have knowledge of how similarly situated
25 persons received promotions and pay raises during the relevant timeframe, including
26 the similarly situated persons, their supervisory chain of command and the persons

1 working in CUC's personnel office (Mr. Pangelinan does of course know some of
2 these names, but due to the sensitive nature of other persons' employment
3 information, that information is not set forth herein).

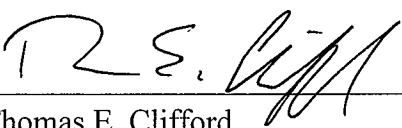
4 B. Documents. Those documents that show how similarly situated persons received
5 promotions and pay raises during the relevant timeframe, including their personnel files and
6 pay statements.

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8 C. Damages computations. Mr. Pangelinan cannot provide this information until he
9 receives and reviews the relevant documents described above.

10 D. Insurance agreements. Not applicable.

11 Mr. Pangelinan reserves the right to supplement these disclosures as the case
12 proceeds.

13 Respectfully submitted this 3rd day of June, 2008.

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18 Thomas E. Clifford
19 Attorney for Plaintiff
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